

12-13-11A05:33 RCVD

December 9, 2011

**Via E-Mail and Overnight Mail**

Mr. Chris Hoidal  
Director, Western Region  
Pipeline and Hazardous Materials Safety Administration  
US Department of Transportation  
12300 W. Dakota Ave., Suite 110  
Lakewood, CO 80228

**Re: CPF 5-2011-1008M  
Response to Notice of Amendment**

Dear Mr. Hoidal:

On October 11, 2011, we received the Notice of Amendment ("NOA") in the above-referenced case from the Pipeline and Hazardous Materials Safety Administration ("PHMSA") finding apparent inadequacies within the plans or procedures of Ruby Pipeline, L.L.C ("Ruby").

This letter provides our response to the Notice of Amendment.

**Item 1**

Ruby has made changes to its Welding Manual effective November 11, 2011, which addresses the issues itemized in the NOA's Item 1. We are attaching the modified Welding Manual procedure, WM015, for your information and review.

**Item 2**

Ruby has made changes to its Welding Manual effective November 11, 2011, which addresses the issues itemized in the NOA's Item 2. We are attaching the modified Welding Manual procedure, WM120, for your information and review.

**Item 3**

Ruby has made changes to its O&M Manual regarding safety-related condition reports effective October 31, 2011, which addresses the issue itemized in the NOA's Item 3. We are attaching the modified O&M Manual Section 801 for your information and review.

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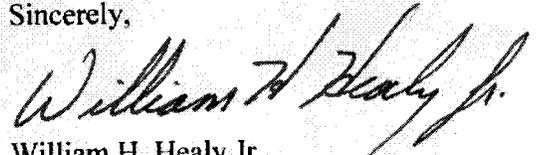
**Item 4**

Ruby has drafted new language for its Pipeline Operating and Procedure Manual to address this issue and is currently following its Management of Change process to update the Manual. When the changes are complete, expected by December 16, 2011, they will reflect the expectations of the NOA's Item 4. We are attaching the applicable draft section of the Pipeline Operating and Procedure Manual for your information and review. We are not expecting this draft to change between this submittal and the final approval and publishing date. Also, as you know, Ruby conducted the required geometry tool assessment of its line prior to placing the line in service last July and addressed all required remediation activities at that time. The revised procedures described in the attachment will be finalized well before Ruby's third anniversary of being in service and will be utilized for the baseline internal assessment conducted with a magnetic flux tool.

We appreciate your continuing attention to pipeline safety and submit these responses to the NOA issues for your review.

If you have any questions please do not hesitate to contact me.

Sincerely,



William H. Healy Jr.  
Vice President - Ruby Engineering